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Attorneys for Defendant,
Weican Null Meng

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ZHANG ZIYI, an individual,

Plaintiff,

vs.

CHINA FREE PRESS, INC., a North
Carolina non-profit corporation doing
business as BOXUN NEWS; WEICAN
NULL MENG, an individual known as
WATSON MENG and also WEICAN
“WATSON” MENG; DOES 1-25,
inclusive,

Defendants.

Case No. CV12-5216-DMG (PLAX)

**DECLARATION OF J.
MALCOLM DEVOY**

Date: January 25, 2013
Time: 9:30 a.m.
Dept.: 7

DECLARATION OF J. MALCOLM DEVOY

I, J. MALCOLM DEVOY IV, declare and state as follows:

1. I am an attorney duly licensed to practice in the State of Nevada and I am an associate at Randazza Legal Group, attorneys of record for Defendant Weican Null Meng (“Meng”). I have first-hand knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. The Randazza Legal Group received no notice of expert witness disclosures prior to the filing of Plaintiff’s Opposition to Defendant Meng’s

1 Special Motion to Strike Under California Civil Procedure Code § 425.16, filed
2 January 4, 2013. (ECF 48, 52, 53)

3 3. I, however, e-mailed Plaintiff's attorneys, Glaser Weil Fink Jacobs
4 Howard Avchen & Shapiro LLP, Meng's expert witness disclosures on November
5 9, 2012. (*See* ECF 39-2)

6 4. Additionally, Meng and his experts produced numerous documents
7 totaling well over 100 pages to Plaintiff's counsel pursuant to their requests for
8 documents pertaining to Meng, Mary Hausch, and David Ardia.

9 5. Attached hereto as Exhibit A is a true and correct copy of the
10 Fundraising Report for Boxun News, which was produced as Exhibit 2 in Volume
11 II of the Deposition of Watson Meng, dated October 17, 2012.

12 6. Attached hereto as Exhibit B is a true and correct copy of the New
13 York Times article "In Rise and Fall of China's Bo Xilai, an Arc of Ruthlessness,"
14 by Michael Wines, originally published on May 6, 2012 and available online at
15 [http://www.nytimes.com/2012/05/07/world/asia/in-rise-and-fall-of-chinas-bo-xilai-](http://www.nytimes.com/2012/05/07/world/asia/in-rise-and-fall-of-chinas-bo-xilai-a-ruthless-arc.html?ref=boxilai&pagewanted=all)
16 [a-ruthless-arc.html?ref=boxilai&pagewanted=all](http://www.nytimes.com/2012/05/07/world/asia/in-rise-and-fall-of-chinas-bo-xilai-a-ruthless-arc.html?ref=boxilai&pagewanted=all); the attached PDF copy of the
17 article was created on January 10, 2013.

18 7. Attached hereto as Exhibit C is a true and correct copy of the articles
19 that were produced as Exhibit 32 in Volume II of the Deposition of Mary Hausch,
20 dated November 16, 2012.

21 8. Attached hereto as Exhibit D is a true and correct copy of the Channel
22 News Asia article "Zhang Ziyi Embroiled in Donation Scandal," originally
23 published on February 5, 2010 and available online at
24 <http://www.channelnewsasia.com/stories/entertainment/view/1035556/1/.html>; the
25 attached PDF copy of the article was created on January 10, 2013.

26 9. Attached hereto as Exhibit E is a true and correct copy of Mary
27 Hausch's supplemental report of findings that was produced as Exhibit 30 in

1 Volume II of the Deposition of Mary Hausch, dated November 14, 2012 and
2 stamped as an exhibit on November 16, 2012.

3 10. Attached hereto as Exhibit F is a true and correct copy of the
4 declaration of Karen List that was produced as Exhibit 31 in Volume II of the
5 Deposition of Mary Hausch; Ms. List executed this document on November 6,
6 2012 and it was stamped as evidence at Ms. Hausch's deposition on November 16,
7 2012.

8 11. Attached hereto as Exhibit G is a true and correct copy of the
9 document titled "Articles Published From the Same Sources" that Meng produced
10 to Plaintiff's counsel and was identified as Exhibit 49 in Volume III of the
11 Deposition of Watson Meng on November 19, 2012.

12 12. Attached hereto as Exhibit H are true and correct copies of excerpts
13 from Volume I of the Deposition Transcript of Weican Null (Watson) Meng, dated
14 October 12, 2012.

15 13. Attached hereto as Exhibit I are true and correct copies of excerpts
16 from Volume II of the Deposition Transcript of Weican Null (Watson) Meng,
17 dated October 17, 2012.

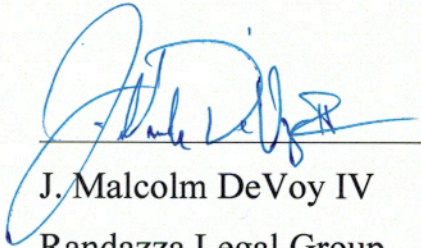
18 14. Attached hereto as Exhibit J are true and correct copies of excerpts
19 from Volume III of the Deposition Transcript of Weican Null (Watson) Meng,
20 dated November 19, 2012.

21 15. Attached hereto as Exhibit K are true and correct copies of excerpts
22 from Volume II of the Deposition Transcript of Professor Mary Hausch, dated
23 November 16, 2012.

24 16. Attached hereto as Exhibit L are true and correct copies of excerpts
25 from the Deposition Transcript of Professor David Ardia, dated December 19,
26 2012.

1 I declare under penalty of perjury pursuant to the law of the United States
2 that the foregoing facts are true and correct.

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4 Executed on this 11th day of January, 2013 in Las Vegas, Nevada.

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9 J. Malcolm DeVoy IV
10 Randazza Legal Group
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CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that I am a representative of Randazza Legal Group and that on this 11th day of January 2013, I caused the document(s) entitled:

DECLARATION OF J. MALCOLM DEVOY

and all attachments to be served by the Court's CM/ECF system.

/s/ Marc J. Randazza
Marc J. Randazza